

SGI Europe's Feedback on the Targeted Revision of the Water Framework Directive (2000/60/EC)

SGI Europe generally appreciates the opportunity to respond to the Call for Evidence regarding the targeted revision of the Water Framework Directive (WFD). As the cornerstone of EU water policy, the WFD's effective implementation is a vital component of the European Water Resilience Strategy (EWRS). We can understand the EU's broader policy priorities aimed at strengthening European competitiveness and reinforcing strategic autonomy in key supply chains, particularly for Critical Raw Materials (CRMs) as outlined in the RESourceEU action plan. However, **we do not see the need for opening the WFD to reach these goals and instead we would like to emphasise the crucial role of the WFD for resilient and clean water for Europeans citizens and a competitive economy.**

The WFD's stated purpose is to establish a framework for the protection of waters, and to prevent further deterioration and protect and enhance the status of aquatic ecosystems. Possibilities for sectors to apply for an exemption to the non-deterioration rule under the WFD, specifically through Article 4(7), already exist. Moreover, more flexibility is given in the recent revision of the WFD, the Groundwater Directive and the Environmental Quality Standards Directive (concerning short-term impacts and relocation of pollution) that has only been finalised in March 2026. These exceptions have not yet even entered into force and therefore have not yet been evaluated. From this perspective, calls for opening the WFD must be regarded as premature.

The WFD is essential for the drinking water sector. Important principles such as the precautionary principle and the polluter pays principle are embedded in it. In addition, the WFD provides crucial tools regarding water quality, the cross-border river basin approach, and the protection of drinking water sources. The ambition of the WFD is to improve water quality to such an extent that drinking water can be produced with less treatment. However, the drinking water sector sees that treatment efforts are increasing, because of poor water quality. **It is therefore crucial to strengthen implementation and enforcement of the WFD, instead of revising and weakening the regulatory framework.** It is important to ensure that legislative changes are only considered where the identified challenges cannot be effectively addressed through improved implementation of the existing framework.

If, after careful consideration of the evidence available and despite the arguments listed above, the Commission decides to proceed with a revision of the WFD, we underline that this revision should not compromise the protection of the environment or human health. While the initiative seeks to address challenges faced by the mining and metal processing sectors regarding the non-deterioration principle, we must ensure that downstream water quality and the health of local populations are not jeopardised. **We must safeguard the affordability and accessibility of good quality drinking water** for all European citizens.

In pursuing simplifying for sustainable competitiveness, we emphasise that meaningful simplification must be practical, evidence-based, and focused on areas where compliance costs are disproportionate. **It is essential that simplification does not come at the expense**

of regulatory quality, transparency, or stakeholder involvement. We advocate for robust stakeholder input and a full impact assessment to avoid the pitfalls of previous Omnibus packages that risked undermining the credibility of the better regulation framework. To minimise legal uncertainty and ensure effective implementation, the revised rules must utilise clear and consistent language. Furthermore, we support maintaining the WFD's existing approach of providing Member States with the flexibility to identify location-specific measures while ensuring a level playing field.

While the initiative seeks to address challenges faced by the mining and metal processing sectors regarding the non-deterioration principle, we must ensure that downstream water quality and the health of local populations are not jeopardised. **We should safeguard the affordability and accessibility of good quality drinking water** for all European citizens. Preventing pollution at source is still most efficient and cost effective and should be upheld during the targeted revision.

Finally, we stress that regulatory stability is a fundamental prerequisite for attracting capital for water infrastructure, digitalisation, and nature-based solutions. Because these projects often involve planning horizons spanning several decades, it is essential that this targeted revision provides a predictable framework that integrates seamlessly with the 2026 updates to the WFD, the Groundwater Directive and Environmental Quality Standards Directives. Achieving long-term water resilience and economic competitiveness depends entirely on the stable and effective implementation of the EU's comprehensive water acquis. **We plead for implementing the WFD in its current form and strengthening pollution prevention at source.**